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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

No. 4:20-cv-03919 CW

**JOINT STIPULATION AND
[PROPOSED] ORDER STAYING
ACTION PENDING SETTLEMENT
APPROVAL**

Hon. Claudia Wilken

1 Pursuant to Northern District of California Civil Local Rule 7-12, Plaintiffs in the above-
2 captioned action and Defendants National Collegiate Athletic Association (“NCAA”), Pac-12
3 Conference (“Pac-12”), Big Ten Conference, Inc. (“Big Ten”), Big 12 Conference, Inc. (“Big 12”),
4 Southeastern Conference (“SEC”), and Atlantic Coast Conference (“ACC”) (collectively,
5 “Defendants”) (Plaintiffs and each Defendant is referred to herein as a “Party” and all Defendants
6 together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel of
7 record, submit the following Stipulation and Proposed Order:

8 WHEREAS, the Parties have agreed to the principal terms on which the Parties will settle *In*
9 *re College Athlete NIL Litigation*, Case No. 4:20-cv-03919 CW (N.D. Cal.), *Hubbard et al. v.*
10 *National Collegiate Athletic Association et al.*, Case No. 23-cv-01593 (N.D. Cal.), and *Carter et al.*
11 *v. National Collegiate Athletic Association et al.*, Case No. 3:23-cv-06325-RS (N.D. Cal.);

12 WHEREAS, the terms of the settlement were jointly agreed to after arms-length negotiations;

13 WHEREAS, the Parties are working expeditiously and in good faith to finalize the long-form
14 settlement agreement, and anticipate that a motion for preliminary approval of the settlement will be
15 filed on or before thirty (30) days from the date of this stipulation, but in any event no later than
16 forty-five (45) days from the date of this stipulation;

17 WHEREAS, in furtherance of the settlement, and to conserve judicial and party resources, the
18 Parties agree, and request that the Court stay all deadlines and proceedings pending filing of the
19 settlement and motion for preliminary approval.

20 THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO COURT APPROVAL,
21 THAT:

22 1. All deadlines are hereby STAYED pending the Court’s ruling on Plaintiffs’ motion to
23 preliminarily approve the settlement between Plaintiffs and Defendants pursuant to Rule 23 of the
24 Federal Rules of Civil Procedure.

25 2. If the Court grants preliminary approval, the case shall remain stayed pending final
26 approval of the settlement.

1 3. If the Court does not grant preliminary approval, the Parties shall promptly negotiate
2 in good faith regarding a new schedule to be submitted for Court approval.

4 Dated: May 30, 2024

Respectfully submitted,

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E-FILING ATTESTATION

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve. W. Berman
STEVE W. BERMAN (*pro hac vice*)

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

THE HONORABLE CLAUDIA WILKEN
United States District Court Judge